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October 21, 2022

VIA ECF

The Honorable Sarah L. Cave
United States District Court for the Southern District of New York
500 Pearl Street, Room 1670
New York, NY 10007

Re: *Coventry Capital US LLC v. EEA Life Settlements, Inc., et al.*, Civil Action No. 1:17-cv-07417-JLR-SLC

Dear Judge Cave:

I write on behalf of Coventry Capital US LLC (“Coventry”) regarding Coventry’s October 21, 2022 letter. Coventry filed its letter publicly on ECF, but did not file public versions of the accompanying exhibits. Exhibits 1-3 and 5-8 are deposition excerpts designated confidential, documents produced during discovery that have been marked “Confidential,” discovery responses marked confidential, and correspondence regarding discovery responses that were marked confidential all belonging to EEA Life Settlements, Inc. (“EEA”). As such, Coventry has provisionally filed these documents under seal. Coventry takes no position as to whether these documents should remain under seal.

Exhibit 4 is an excerpt of deposition testimony from Vincent Piscaer. Coventry seeks sealed treatment of Exhibit 4 because it contains examination involving confidential and commercially sensitive topics concerning Coventry’s diligence on life-insurance policies and portfolios it is considering purchasing. Similar interests led Defendant EEA Life Settlements, Inc. (“EEA”) to request sealed treatment of exhibits submitted in connection with prior discovery disputes, e.g., Dkt. No. 245; Dkt. No. 251, which requests the Court granted, e.g., Dkt. No. 248; Dkt. No. 254.

We appreciate the Court’s attention to these matters and are prepared to address them further at the Court’s convenience.

Plaintiff's letter-motions seeking to file exhibits 1–8 under seal (ECF Nos. 372–73) are GRANTED, and the documents at ECF No. 374-1 – 374-8 shall remain visible only to the selected parties.

The Clerk of Court is respectfully directed to close ECF Nos. 372 and 373.

SO ORDERED 10/24/22


SARAH L. CAVE
United States Magistrate Judge

WILLIAMS & CONNOLLY^{LLP}

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Respectfully submitted,

A handwritten signature in black ink, appearing to be "DH" followed by a stylized flourish.

Denis Hurley

cc: Counsel of Record